

the amendments to the drawing, specification, and claim made hereby render moot the Examiner's objections and rejections.

Referring initially to the objections to the drawing and specification, the Applicant hereby submits a proposed amendment to sheet 2/20 of the drawing. The proposed amendments clarify that FIGS. 1A, 1B, and 1C depict motion control server systems 20a, 20b, and 20c, respectively. In addition, FIGS. 1A, 1B, and 1C have been amended to correctly identify the motion control system using reference character 24 and the communications network using reference character 26. Finally, FIGS. 1A, 1B, and 1C have been amended to clarify that the data source 26 comprises or is formed at least in part by the application program 28 as shown in FIG. 2. The specification has been amended to clarify the relationship between the data source 26 and application program 28 as reflected in FIG. 2 as originally submitted.

The Applicant has further taken this opportunity to correct several clerical errors in the specification as originally filed. First, the Applicant has amended the Related Applications section of the specification correct the serial number of the parent provisional patent application and to incorporate the disclosure of the provisional application be reference. The Applicant has further amended the specification throughout to change the word "exemplary" to the word "example"; this change in terminology is intended to clarify that the elements following the word "exemplary" are presented by way of example only and that these elements are in no way preferred or better than other examples of these elements.

The Applicant respectfully submits that the amendments to the drawing and specification presented herein do not, and are not intended to, change the scope of the disclosure contained in the drawing and specification.

Turning now to the rejection of claim 1 under 35 USC § 112, second paragraph, the Applicant has amended claim 1 to specify that "the client build module transmits the service request envelope across the communications network". The Applicant respectfully submits that this amendment clarifies that the service request is indeed transmitted across the network, rendering moot the rejection under 35 USC § 112.

The Applicant has further amended claim 1 to distinguish the claimed invention from the teachings of European Patent Application No. EP 821522 A2 to Sato et al. In

particular, claim 1 has been amended to specify that the motion control system comprises a motion services module as defined on page 8 of the present application.

The service request format module converts a hardware independent service request into a hardware independent service request method and invokes the hardware independent service request method on the motion services module. The motion services module in turn converts the hardware independent service request method into a hardware dependent motion command. The motion control system then operates in response to the motion command to perform the service associated with the service request.

The Applicant respectfully submits that the Sato et al. reference does not disclose, teach, or suggest the conversion of a hardware independent service request that is included in a service request envelop, used to create a service request method, and then subsequently converted into a hardware dependent motion command. To the contrary, the Sato et al. patent discloses a system that is highly hardware dependent from the external device to the video camera.

The system recited in claim 1 thus provides two levels of hardware independence that are not found in any of the cited prior art references, including Sate el al.: first, the system of claim 1 is independent of the details of any communications network used to transport the service request from the client application to the motion control system; and second, service requests are independent of the details of the motion control system itself. Claim 1 thus defines a highly hardware independent system unlike that disclosed in the Sato et al. reference or any other reference of which the Applicant is aware.

Given the foregoing, the Applicant respectfully submits that the amendments to claim 1 distinguish the present invention over the teachings of Sato et al. and requests withdrawal of the rejection to claim 1 based on the Sato et al. reference. The Applicant has further taken this opportunity to add dependent claims 2-12, which further define claim 1 and should be allowable for at least the reasons set forth above.

Submitted herewith is a document (entitled Exhibit A - Listing of All Claims and Amendments (06-10-2005)) containing a listing of the claims as currently presented. The attached Listing contains the amendments to the specification and the text of each

pending claim, along with any amendments made to the claims (illustrated using strikethrough and underlining) and the status of each pending claim.

Given the foregoing, the Applicant respectfully submits that currently pending claims 1-12 are in condition for allowance, and such allowance is respectfully requested. If there is any matter which could be expedited by consultation with the Applicant's attorney, such would be welcome. The Applicant's attorney can normally be reached at the telephone number below.

Signed at Bellingham, County of Whatcom, State of Washington this 10th day of June, 2005.

Respectfully submitted,

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